

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

BECKMAN COULTER, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 24-945 (CFC) (EGT)
	)	
CYTEK BIOSCIENCES, INC.,	)	
	)	
Defendant.	)	

**MOTION FOR CONFERENCE TO RESOLVE DISCOVERY DISPUTES**

Plaintiff Beckman Coulter, Inc. and Defendant Cytek Biosciences, Inc. (collectively, the “Parties”) respectfully move this Court to schedule a conference to address the following outstanding disputes:

1. Cytek’s objection to disclosure of Cytek’s confidential information to Beckman Coulter’s proposed expert, J. Paul Robinson, under the Protective Order.
2. The scope of Beckman Coulter’s amended infringement contentions.

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in a verbal meet-and-confer (by telephone) on the following date:

- October 30, 2025 – approximately 30 minutes

**Plaintiff’s Counsel:**

Delaware Counsel: Christine D. Haynes

Lead Counsel: Omar A. Khan, Jeffrey A. Dennhardt, and Asher McGuffin

**Defendant’s Counsel:**

Delaware Counsel: Jeremy Tigan

Lead Counsel: Reuben Chen; Betsy Flanagan; and HanByul Chang

The parties are available on the following dates:

November 20, 2025

November 21, 2025

November 24, 2025

This dispute is the third time that a discovery or protective order dispute has been brought before the Court.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

OF COUNSEL:

Reuben H. Chen  
HanByul Chang  
Juan Pablo González  
COOLEY LLP  
3175 Hanover Street  
Palo Alto, CA 94304  
(650) 843-5000

Elizabeth M. Flanagan  
COOLEY LLP  
30 S. 9th Street, 7th Floor  
Minneapolis, MN 55402

Adam Pivovar  
Dustin M. Knight  
Rosalynd D. Upton  
David Yun  
COOLEY LLP  
1299 Pennsylvania Avenue NW, Suite 700  
Washington, DC 20004  
(202) 842-7800

/s/ Jeremy A. Tigan

Karen Jacobs (#2881)  
Jeremy A. Tigan (#5239)  
Cameron P. Clark (#6647)  
1201 North Market Street  
P.O. Box 1347  
Wilmington, DE 19899  
(302) 658-9200  
kjacobs@morrisnichols.com  
jtigan@morrisnichols.com  
cclark@morrisnichols.com

*Attorneys for Defendant  
Cytek Biosciences, Inc.*

RICHARDS, LAYTON & FINGER P.A.

OF COUNSEL:

Omar A. Khan  
Jeffrey A. Dennhardt  
Lauren E. Matlock-Colangelo  
WILMER CUTLER PICKERING HALE AND  
DORR LLP  
7 World Trade Center  
250 Greenwich Street  
New York, NY 10007  
(212) 230-8800

Asher S. McGuffin  
WILMER CUTLER PICKERING HALE AND  
DORR LLP  
60 State Street  
Boston, MA 02109  
(617) 526-6000

/s/ Christine D. Haynes

Frederick L. Cottrell III (#2555)  
Kelly E. Farnan (#4395)  
Christine D. Haynes (#4697)  
One Rodney Square  
920 North King Street  
Wilmington, Delaware 19801  
(302) 651-7700  
cottrell@rlf.com  
farnan@rlf.com  
haynes@rlf.com

*Attorneys for Plaintiff*

Dated: November 12, 2025